Report: CZR0026

21ST JUDICIAL CIRCUIT
ST LOUIS COUNTY
CIRCUIT COURT DOCKET SHEET

Date:

24-May-2010

Time:

12:59:33PM

Page:

10SL-CC01296 DAWN MCDONALD V CITY OF FLORISSANT Security Level: 1 Public

**MISSOURI ETAL** 

Case Type:

CC Other Tort

Case Filing Date:

00 11- 0040

Status:

Pet Filed in Circuit Ct

30-Mar-2010

Disposition:

Disposition Date:

Release/Status Reason

**Change Date** 

Judge Plaintiff STEVEN H GOLDMAN (22765)

**DAWN MCDONALD (@261237)** 

Attorney for Plaintiff

GREGORY G FENLON(35050)

CITY OF FLORISSANT MISSOURI (CTYFLORSN)

ANDREW GERWITZ (@263728)

Filing Date

Defendant

**Description** 

30-Mar-2010

Judge Assigned

Pet Filed in Circuit Ct

Filing:

**FILING INFORMATION SHEET** 

Interrogatories Filed

08-Apr-2010

**Summons Issued-Circuit** 

Document ID: 10-SMCC-5190, for CITY OF FLORISSANT MISSOURI. - HAND DELIVERED TO ST

LOUIS COUNTY SHERIFF

Service/Attempt Date: 12-Apr-2010

**Summons Issued-Circuit** 

Document ID: 10-SMCC-5191, for GERWITZ, ANDREW. - HAND DELIVERED TO ST LOUIS

**COUNTY SHERIFF** 

Service/Attempt Date: 13-Apr-2010

05-May-2010

**Summons Personally Served** 

Document ID - 10-SMCC-5191; Served To - GERWITZ, ANDREW; Server - ADAMS, PHIL; Served

Date - 04-MAY-10; Served Time - 00:00:00; Service Type - Territory 1; Reason Description -

Served; Service Text - LEFT COPY

**Summons Personally Served** 

Document ID - 10-SMCC-5190; Served To - CITY OF FLORISSANT MISSOURI; Server - ADAMS, PHIL; Served Date - 04-MAY-10; Served Time - 00:00:00; Service Type - Territory 1; Reason

Description - Served; Service Text - LEFT COPY

EXHIBIT



### IN THE 21ST JUDICAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOUF

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Judge or Division:	Case Number: 10SL-CC01296	
STEVEN H GOLDMAN		20
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address	7971
DAWN MCDONALD	Plaintiff's/Petitioner's Attorney/Address GREGORY G FENLON SUITE 300 3   U - 362 -	1 '
	SUITE 300 3 POPULOMME	
	vs. SAINT LOUIS, MO 63105	
Defendant/Respondent: CITY OF FLORISSANT MISSOURI	Court Address: ST LOUIS COUNTY COURT BUILDING	
Nature of Suit: CC Other Tort	7900 CARONDELET AVE CLAYTON, MO 63105	(Date File Stamp)
5	Summons in Civil Case	
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	7711 BONHOMME	- ·
Y		
Defendant/Respondent: CITY OF FLORISSANT MISSOURI	Court Address: ST LOUIS COUNTY COURT BU	JILDING
Nature of Suit:	7900 CARONDELET AVE	
CC Other Tort	CLAYTON, MO 63105	(Date File Stamp)
	Summons in Civil Case	
The State of Missouri to: ANDREW GERWIT	Z	0
FLORISSANT, MO 63033	565-8	1/6
COURT SEAL OF You are summe	ned to appear before this court and to fi	ile your pleading to the petition, a copy of
which is attached, a	id to serve a copy of your pleading upon	the attorney for Plaintiff/Petitioner at the
above address all wi	thin 30 days after receiving this summor Idament by default may be taken agains	is, exclusive of the day of service. If you fail to type for the relief framanded in the petition.
	raginent by default may be taken agains	de la laction de la company de
08-APR-2010 Date		Clerk
ST. LOUIS COUNTY Further Information: JDG	V	
	Sheriff's or Server's Return	
Note to serving officer: Summons should be returned	ed to the court within thirty days after the d	late of issue.
I certify that I have served the above summons by: (	check one)	
delivering a copy of the summons and a copy of		
leaving a copy of the summons and a copy of the		
PREST RECORDS CLARK		
(for service on a corporation) delivering a copy of	i the summons and a copy of the petition to	
	(name)	OF 是 (title). <b>令</b>
other		
Served at SAMIZ FLOR 155 ANT	POLICE DEPT	(address)
in STLOUIS 20. (County/Cit	v of St. Louis) MO on F/U/L	
PAIL ADAYS	y 01 01. E013); 1110; 011	
Printed Name of Sheriff or Server		Signature of Sheriff bry Server
	a notary public if not served by an autho	
	before me on	
(Seal)	belote Hie on	(date).
My commission expires	:Date	Notary Public
Sheriff's Fees, if applicable		
Summons \$		\
Non Est \$ Sheriff's Deputy Salary		<b>\</b>
Supplemental Surcharge \$ 10.00		
Mileage \$(	miles @\$ per mile)	
Total \$		
A copy of the summons and a copy of the petition must	be served on each Defendant/Respondent	. For methods of service on all classes of
suits, see Supreme Court Rule 54.		

APR 13 2010

# Case: 4:10-dv-00986-CDP Doc. #: 1-1 Filed: 05/28/10 Page 3 tof 18 Page D # 6 IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

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Judge or Division:	-	Case Number: 10SL-CC01296	+		
STEVEN H GOLDMAN					
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Address			
DAWN MCDONALD		GREGORY G FENLON			
		SUITE 300			
		7711 BONHOMME			
	vs.	SAINT LOUIS, MO 63105			
Defendant/Respondent:		Court Address:			
CITY OF FLORISSANT MISSOURI		ST LOUIS COUNTY COURT BUILDING	G		
Nature of Suit:		7900 CARONDELET AVE		-	
CC Other Tort		CLAYTON, MO 63105		(Da	nte File Stamp)
	Sı	ımmons in Civil Case			
The State of Missouri to: CITY OF FLO	RISSAN	T MISSOURI			

Nature of Suit: CC Other Tort	CLAYTON, MO 63105	(Data File Stamp)
CO OTHER TOTAL	Summons in Civil Case	(Date File Stamp)
The State of Missouri	to: CITY OF FLORISSANT MISSOURI	
OCE DUE OF ED ANGOR	Alias: SERVE: MAYOR ROBERT LOWERY	B 5-8
COURT SEAL OF	You are summoned to appear before this court and which is attached, and to serve a copy of your pleading up above address all within 30 days after receiving this summifile your pleading, judgment by default may be taken aga 08-APR-2010  Date	pon the attorney for Plaintiff/Petitioner at the mons, exclusive of the day of service. If you fail to
ST. LOUIS COUNTY	Further Information:	•
leaving a copy of the s	ation) delivering a copy of the summons and a copy of the petition (name) SECRO	abode of the Defendant/Respondent with espondent's family over the age of 15 years. On to
Served at SAUS		(address)
	County/City of St. Louis), MO, on	Signature of Sheriff or Server
Sheriff's Fees, if applicable Summons \$ Non Est \$ Sheriff's Deputy Salary Supplemental Surcharge \$ Mileage \$ Total \$ A copy of the summons and a		7. Can Charles (1971)



#### Case: 4:10-cv-00986-CDP Doc. #: 1-1 Filed: 05/28/10 Page: 4 of 18 PageID #: 7

#### IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Case Number: 10SL-CC01296	
Plaintiff's/Petitioner's Attorney/Address	7
GREGORY G FENLON	
SUITE 300	
7711 BONHOMME	
SAINT LOUIS, MO 63105	
Court Address:	
ST LOUIS COUNTY COURT BUILDING	
7900 CARONDELET AVE	
CLAYTON, MO 63105	(Date File Stamp)
	Plaintiff's/Petitioner's Attorney/Address GREGORY G FENLON SUITE 300 7711 BONHOMME SAINT LOUIS, MO 63105 Court Address: ST LOUIS COUNTY COURT BUILDING 7900 CARONDELET AVE

#### Summons in Civil Case The State of Missouri to: CITY OF FLORISSANT MISSOURI Alias: 955 RUE ST FRANCOIS SERVE: MAYOR ROBERT LOWERY FLORISSANT, MO 63033 COURT SEAL OF You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief a manded in the petition. 08-APR-2010 Date ST. LOUIS COUNTY Further Information: JDG Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within thirty days after the date of issue. I certify that I have served the above summons by: (check one) delivering a copy of the summons and a copy of the petition to the Defendant/Respondent. leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years. (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_(name)\_\_\_\_\_ (title). other \_\_\_\_ Served at \_\_\_\_\_ \_\_\_\_(address) \_\_\_\_\_(County/City of St. Louis), MO, on \_\_\_\_\_\_(date) at \_\_\_\_\_(time). Printed Name of Sheriff or Server Signature of Sheriff or Server Must be sworn before a notary public if not served by an authorized officer: Subscribed and sworn to before me on \_\_\_\_\_ (Seal) My commission expires: Notary Public Sheriff's Fees, if applicable Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge \$ 10.00 \_\_\_\_\_ ( \_\_\_\_\_\_ per mile) Mileage Total A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.





## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

" Matter"			
Judge or Division: STEVEN H GOLDMAN	Case Number: 10SL-CC01296	5	
Plaintiff/Petitioner: DAWN MCDONALD	Plaintiff's/Petitioner's Attorney/A	Address	
DAWN MODONADD	SUITE 300 7711 BONHOMME	7	
	vs. SAINT LOUIS, MO 63105		
Defendant/Respondent: CITY OF FLORISSANT MISSOURI	Court Address: ST LOUIS COUNTY COURT B	BUILDING	
Nature of Suit: CC Other Tort	7900 CARONDELET AVE CLAYTON, MO 63105		(Date File Stamp)
	Summons in Civil Case	<u> </u>	Ditte : 110 Ditting;
The State of Missouri to: ANDREW GEI			
Alias: 1700 NORTH HIGHWAY 67 - POE FLORISSANT, MO 63033	······································		
which is attach above address	ummoned to appear before this court and to led, and to serve a copy of your pleading upo all within 30 days after receiving this summo ing, judgment by default may be taken again	on the attorney for Plaintiff/Peons, exclusive of the day of ser	etitioner at the
08-APR-2010 Date		Clerk	
ST, LOUIS COUNTY Further Information		,	
Note to serving officer: Summons should be r	Sheriff's or Server's Return eturned to the court within thirty days after the	date of issue.	
I certify that I have served the above summons	by: (check one)		
delivering a copy of the summons and a copy of the summons and a copy of	by of the petition to the Defendant/Respondent. of the petition at the dwelling place or usual above.	ode of the Defendant/Responde	nt with
(for service on a corporation) delivering a co	a person of the Defendant's/Responsor of the summons and a copy of the petition	ondent's family over the age of	15 years.
			(title)
other			(title).
			·
Served at			(address)
in(Count	y/City of St. Louis), MO, on	(date) at	(time).
Printed Name of Sheriff or Server		Signature of Sheriff or Server	r
Must be sworn be	fore a notary public if not served by an auth		
Subscribed and sw	orn to before me on		
(Detti)	pires:	,	
my communication on	Date	Notary Publi	ic
Sheriff's Fees, if applicable Summons \$ Non Est \$		,	<u> </u>
Sheriff's Deputy Salary			
Supplemental Surcharge \$ 10.00 Mileage \$ (	miles @ C		
Total \$	miles @ \$ per mile)		
A copy of the summons and a copy of the petition	must be served on each Defendant/Responden	t. For methods of service on all	classes of
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suits, see Supreme Court Rule 54.

Case: 4:10-cv-00986-CDP Doc. #: 1-1 Filed: 05/28/10 Page: 6 of 18 PageID #: 9

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS STATE OF MISSOURI

DAWN MCDONALD,	OFOUR OLD W
Plaintiff,	
vs.	No. No. Division
CITY OF FLORISSANT, MISSOURI	) Division
a Municipal Corporation,	
Serve: Mayor Robert Lowery	
955 Rue St. Francois	
Florissant, Missouri 63033	)
-and-	
ANDREW GERWITZ,	j
	)
Serve: P.O.E.	)
1700 North Highway 67	)
Florissant, Missouri 63033	)
	)
Defendants.	)

# PLAINTIFF'S PETITION FOR DAMAGES

Comes now Plaintiff and for her petition against defendants City of Florissant and Andrew Gerwitz states as follows:

 At all times mentioned herein plaintiff Dawn McDonald was a citizen and resident of the United States of America and the State of Missouri, County of St. Louis, Missouri.

- 2. At all times mentioned herein, defendant City of Florissant was a municipal corporation within the County of St. Louis and State of Missouri.
- 3. At all times mentioned herein, defendant Andrew Gerwitz was a peace officer employed by defendant City of Florissant, acting within the scope and course of his employment as a City of Florissant Police Officer.
- 4. At all times mentioned herein, defendant Andrew Gerwitz was acting under color of law as a Florissant Police Officer.
- 5. At all times mentioned herein, plaintiff occupied, as her home, the residence located at 9237 Shadydale Dr., Jennings, Missouri.
- 6. The residence located at 9237 Shadydale Dr., Jennings, Missouri was a single family residence which plaintiff occupied exclusively with her two year old daughter.
- 7. On Monday, January 11, 2010 defendant Gerwitz traveled from Florissant Missouri to 9237 Shadydale Dr., Jennings, Missouri.
- 8. On said date Gerwitz traveled to plaintiff's home in a marked police car accompanied by a uniformed Florissant Police Officer.
- 9. On said date Gerwitz and the uniformed officer knocked on plaintiff's door and, in response thereto, plaintiff opened the door and had a brief conversation with the police officers.
  - 10. At the time, plaintiff was home alone with her daughter.

- 11. Shortly thereafter, Defendant Gerwitz and the uniformed officer entered plaintiff's residence and conducted a search of the premises.
  - 12. The search was conducted without plaintiff's permission.
  - 13. The search was conducted without a search warrant.
- 14. The search was conducted without exigent circumstances which would justify a warrantless search of plaintiff's residence.
- 15. The search was conducted by the police officers forcing their way into plaintiff's residence.
- 16. The search was conducted outside the city limits of the City of Florissant and in the City of Jennings, Missouri.
- 17. Plaintiff had a reasonable expectation of privacy regarding the interior of her residence.
- 18. The Fourth Amendment to the United States Constitution prohibits unreasonable searches and seizures.
- 19. The search of plaintiff's residence was an unreasonable search within the meaning of the Fourth Amendment.
- 20. The search by defendant Gerwitz was an unreasonable search in violation of the Fourth Amendment.
- 20. Plaintiff seeks damages and compensation for the violation of her civil and constitutional rights pursuant to 42 U.S.C. § 1983.

- 21. The search by defendant Gerwitz was causally related to the failure of the defendant City of Florissant to adequately train their police officers where to conduct searches and to further train officers regarding those limited circumstances which would justify a warrantless search of a citizen's residence.
- 22. As a direct and proximate result of the aforementioned conduct of defendants plaintiff has been damaged.
- 23. In addition to her actual damages, plaintiff is entitled to damages for the constitutional violations as herein described and reasonable attorneys fees and costs.

WHEREFORE, plaintiff prays judgment against defendant City of Florissant and Andrew Gerwitz, jointly and severally, for damages in an amount which will fairly and justly compensate plaintiff, for her attorneys fees and costs, and for whatever other and further relief as to the Court shall seem meet and proper in the premises.

GREGORY G. FENLON #35050

7711 Bonhomme, Suite 300 Clayton, Missouri 63105

(314) 862-7999; fax 862-8999

ggfmoatty@aol.com Attorney for plaintiff

# IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS STATE OF MISSOURI

DAWN MCDONALD,	)
	)
Plaintiff,	)
	)
vs.	) No.
	)
CITY OF FLORISSANT, MISSOURI	) Division
a Municipal Corporation,	)
	)
Serve: Mayor Robert Lowery	)
955 Rue St. Francois	)
Florissant, Missouri 63033	)
_	)
-and-	)
	)
ANDREW GERWITZ,	)
	)
Serve: P.O.E.	)
1700 North Highway 67	)
Florissant, Missouri 63033	)
<b>5.0.1</b>	)
Defendants.	)

Plaintiff's First Set of Interrogatories Directed to Defendant Andrew Gerwitz

Comes now Plaintiff and, in accordance with the Missouri Rules of Civil Procedure, exhibits the following interrogatories, to be answered by defendant Andrew Gerwitz, under oath and in accordance with the Missouri Supreme Court Rules:

- 1. State:
- (a) The name and address of the person or persons answering these interrogatories;
- (b) His/her relationship to defendant; and
- (c) His/her position of employment.

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2. BACKGROUND INFORMATION

Please state:

(a) Plaintiff's full name;

ANSWER:

(b) Name of Plaintiff's spouse;

ANSWER:

(c) Plaintiff's maiden name, if applicable;

ANSWER:

(d) Plaintiff's age and date of birth;

ANSWER:

(e) Plaintiff's social security number;

ANSWER:

(f) Plaintiff's present home address;

ANSWER:

(g) Any other addresses at which Defendant has lived during the past ten years; ANSWER:

(h) Defendant's present employer's name and position of employment; ANSWER:

(i) Previous employers' names for the past ten (10) years and the dates of employment there.

ANSWER:

(k) Please state the formal education by stating the highest level of education you obtained, whether you have a high school diploma, and whether you have any trade school certification or diploma;

ANSWER:

#### 3. STATEMENTS

State whether or not, following the date of the occurrence mentioned in the Petition in this case, a statement, interview, or report, or a stenographic, mechanical, electrical, audio, video, motion picture, photograph or other recording, or transcription thereof, of the Plaintiffs, or of a statement made by Plaintiffs and contemporaneously recorded, has been secured from Plaintiffs or taken of Plaintiffs; and if so, state the following:

- (a) Date, place and time taken;
- (b) Name and address of the person or persons connected with taking it;
- (c) Names and addresses of all persons present at the time it was taken;
- (d) Whether the statement was oral, written, shorthand, recorded, taped, etc.;
- (e) Was it signed?
- (f) Names and addresses of the persons or organizations under whose direction and upon whose behalf it was taken or made; and
- (g) Please attach an exact copy of the original of the statement, interview, report, film or tape to your answers to these interrogatories; if oral, please state verbatim the contents thereof.

ANSWER:

#### 4. PHOTOGRAPHS, ETC.

State whether there exists photographs, videotapes, or movies with respect to the scene of the occurrence mentioned in the petition taken within one year prior to or subsequent to the incident mentioned in Plaintiffs Petition. If so, state the following:

- (a) Describe each photograph, video, or movie;
- (b) State the date each was taken;
- (c) State the name and address of the person taking each such photo, video, or movie;
- (d) State the name, address, employer, insurer and job title of the person presently having control or custody of each photograph, video, or movie. ANSWER:

#### 5. EXPERTS

List and identify:

- (a) Each person this defendant expects to call as an expert witness at the trial, stating for each such expert:
- (i) Name;

- (ii) Address;
- (iii) Occupation;
- (iv) Place of Employment;
- (v) Qualifications to give an opinion (if such information is available on an expert's curriculum vitae you may attach a copy thereof in lieu of answering this interrogatory subpart.
- (b) With respect to each expert listed, please state the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.
- (c) Identify each non-retained expert witness, including a party, who the defendant expects to call at trial who may provide expert witness opinion testimony by providing the expert's name, address and field of expertise. State also any opinions the expert will testify to at trial.

  ANSWER:

#### 6. WITNESSES

State the names and addresses of each person known by defendant, defendant's representatives or defendant's attorney to have witnessed the occurrence mentioned in the petition, or who were present at the scene within sixty (60) minutes of the occurrence. Designate which of such people actually claim to have witnessed the occurrence.

ANSWER:

#### 7. WITNESS STATEMENTS

State whether or not written or recorded statements have been obtained from any persons mentioned in the answers to Interrogatory Number 6 above with regard to the facts or circumstances surrounding the occurrence mentioned in these pleadings. If so, state the following:

- (a) The names, addresses and employers of persons whose statements were obtained; and
- (b) Name, address, employer, and job title of the person presently having control or custody of each statement.

  ANSWER:

#### 8. CRIMINAL RECORD

State whether Defendant has ever pleaded guilty to or has ever been convicted of a felony or misdemeanor, and if your answer is in the affirmative, please state:

- (a) The date of any such plea or conviction;
- (b) The state and county where said plea or conviction occurred;
- (c) The offense for which defendant pled guilty or was convicted. ANSWER:
- 9. Travel to 9237 Shadydale Dr., Jennings, Mo.

State whether defendant traveled to 9237 Shadydale Dr., Jennings, Missouri, while on duty as a Florissant Police Officer.

ANSWER:

If you answered yes or in the affirmative, please state:

- a. The date you traveled to 9237 Shadydale Dr., Jennings, Missouri; ANSWER:
- b. The approximate time you traveled to 9237 Shadydale Dr., Jennings, Missouri.
  ANSWER:
- c. State whether you went alone or with one or more other persons and if not alone state the name and occupation of each person who traveled with you; ANSWER:
- d. State whether you signed out or followed departmental policy in traveling to 9237 Shadydale Dr., Jennings, Missouri; ANSWER:
- e. State whether you went to 9237 Shadydale Dr., Jennings, Missouri in a marked Florissant Police vehicle; ANSWER:
- f. state each and every reason you had for going to 9237 Shadydale Dr., Jennings, Missouri;
  ANSWER:

- g. Were you looking for an individual for questioning or arrest and, if so, state the name of the individual and what alleged crime you were investigating; ANSWER:
  - 10. Entering the residence at 9237 Shadydale Dr., Jennings, Missouri

State whether you entered the premises of 9237 Shadydale Dr., Jennings, Missouri on or about January 11, 2010.
ANSWER:

If you entered the premises at 9237 Shadydale Dr., Jennings, Missouri please state the following:

- a. what was your intention or purpose for entering the premises at 9237 Shadydale Dr., Jennings, Missouri; ANSWER:
- b. Did you search the premises at 9237 Shadydale Dr., Jennings, Missouri; ANSWER:
- c. state the name and address of all persons who conducted a search of the premises at 9237 Shadydale Dr., Jennings, Missouri; ANSWER:
- d. state the name and address of each person who was present when 9237 Shadydale Dr., Jennings, Missouri; ANSWER:
- e. state whether you had a search warrant to enter the premises; ANSWER:
- f. state whether anyone signed a written consent to search the premises at 9237 Shadydale Dr., Jennings, Missouri; ANSWER:

- g. State whether the Florissant Police Department has written forms commonly known as consent to search forms for completion by someone authorizing a search;
  ANSWER:
- h. Do you claim or contend someone gave you permission to search the premises and, if so, state the name of such person and the basis for your claim or contention;
  ANSWER:

#### 10. INSURANCE

State whether or not any insurance company has an interest in the outcome of this litigation against Defendant. If so, state the following:

- (a) Name of the insurance company;
- (b) Name of the insured;
- (c) Type(s) of insurance;
- (d) Effective policy dates;
- (e) Policy number;
- (f) Policy limits;
- (g) Attach a copy of the declaration page or Certificate of Coverage of such policy of insurance to your answers to these Interrogatories.

  ANSWER:

By∠

GREGORY G. FENLON #35050

7711 Bonhomme, Suite 300 Clayton, Missouri 63105

(314) 862-7999; fax 862-8999

ggfmoatty@aol.com Attorney for plaintiff

#### Certificate of Service

A copy of these interrogatories were attached to the petition for service with summons and petition on defendant.

I certify and attest that the above is a true copy of the original record of the Court in case number  $\frac{10 \int \mathcal{L} \ \mathcal{C} \ \mathcal{C} \ 1296}{}$  as it appears on file in my office.



Issued

May. 24. 2010

JOAN M. GILMER, Circuit Clerk St. Louis County Circuit Court

Ву

Kudona Mululus Depuly Clerk